

1 Chief Judge Marsha J. Pechman
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10 UNITED STATES DISTRICT COURT FOR THE
11 WESTERN DISTRICT OF WASHINGTON
12 AT SEATTLE
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15 UNITED STATES OF AMERICA,
16 Plaintiff
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18 v.
19 DEBRA A. AARON, and
20 SAMUEL A. AARON
21 Defendants.
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NO. CR13-168 MJP
STIPULATED MOTION FOR A
PROTECTIVE ORDER

Noting Date: May 22, 2014

23 The United States of America, by and through Jenny A. Durkan, United States
24 Attorney for the Western District of Washington, and S. Kate Vaughan, Assistant United
25 States Attorney for said District, respectfully move for a Protective Order regarding the
26 disclosure of certain potential *Giglio* information.

27 Pursuant to the government's duty to disclose any credible allegation of
28 misconduct that reflects upon the truthfulness or possible bias of a law enforcement
witness, the government has disclosed to defendants in letter form such potential *Giglio*
information in the above captioned case. For purposes of this motion, the letter that the
government sent to the defendants' attorneys of record is referred to as the "Protected
Material."

1 The government specifically requests that the Court order that the attorneys of
2 record and their investigators be prohibited from duplicating the Protected Material and
3 distributing it to other persons, including the defendants themselves, on the grounds that
4 the Protected Material relates to an ongoing criminal investigation that may be materially
5 harmed damaged by further dissemination. Nothing in this motion is deemed to prevent
6 the defendants' lawyers from sharing the information in the Protected Material with their
7 clients. They simply should not make copies of it. The Protected Material may be
8 maintained in defense counsels' case file in the above captioned case.

9 Further, the government requests that the attorneys of record be required, prior to
10 providing the Protected Material to members of the defense team, to provide a copy of
11 this Protective Order to members of the defense team, and obtain written consent from
12 members of the defense team of their acknowledgment to be bound by the terms and
13 conditions of this Protective Order. The written consent need not be disclosed or
14 produced to the United States unless requested by the Assistant United States Attorney
15 and ordered by the Court.

16 The Order should not limit employees of the United States Attorney's Office for
17 the Western District of Washington from copying and distributing the Protected Material
18 to members of the United States Attorney's Office, federal law enforcement agencies, or
19 to the Court and defense as necessary to comply with the government's discovery
20 obligations.

21 In summary, due to the sensitive nature of the material, the Government
22 respectfully requests that the Court issue a protective order with regards to the Protected
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1 Material identified herein. The parties may seek modification of the Protective Order in
2 the event of changed circumstances.
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4 DATED this 22nd day of May, 2014.

5 Respectfully submitted,
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7 JENNY A. DURKAN
United States Attorney

8 /s/ S. Kate Vaughan
9 S. KATE VAUGHAN
10 Assistant United States Attorney
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CERTIFICATE OF SERVICE

I hereby certify that on May 22, 2014, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the attorney of record for the defendant.

s/**SHONTRICE M. EATON**
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